

AO 91 (Rev. 08/09) Criminal Complaint

**FILED**

January 02, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**UNITED STATES DISTRICT COURT**for the  
**Western District of Texas**  
Pecos DivisionBY: Joseph Hinojos  
DEPUTY

United States of America

v.

Carlos CASTILLO-Valdez

Case No.

**PE: 24-MJ-00006**\_\_\_\_\_  
*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 27, 2023 in the county of Brewster in the  
**WESTERN DISTRICT OF TEXAS**, the defendant(s) violated:*Code Section**Offense Description*Defendant,  
8 USC 1324(a)(1)(A)(ii) &  
(B)(i)

Defendant(s) did knowing or in reckless disregard of the fact that an alien has come to, entered or remains in the United States in violation of law, transport, or move or attempted to transport or move, an alien within the United States by means of transportation or otherwise, in furtherance of such violation of law. for the purpose of commercial advantage and private financial gain.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Complaint sworn to in my presence and signed electronically on this date.  
FED.R.CRIM.P. 4.1(b)(2)(A)Date: 01/02/2024City and state: Pecos, Texas  
Complainant's signature  
**Border Patrol Agent Gerard Compagnoni Jr**  
Printed name and title  
Judge's signature  
**Honorable Judge David B. Fannin**  
United States Magistrate Judge

**AFFIDAVIT**

United States of America

v.

Defendant

1. CASTILLO-Valdez, Carlos

On December 27, 2023, a Texas Department of Public Safety Highway Patrol Trooper was conducting routine patrol on Highway US-385 near Marathon, Texas when the trooper encountered a black Ford Explorer traveling 45 miles per hour (MPH) in a 75 MPH zone. The trooper noticed the vehicle appeared to be heavy in the rear. The trooper conducted routine records checks on the license plate, which showed an expiration date in 2015. The trooper also noted the license plate returned to a Chevrolet. The U.S. Border Patrol checkpoint on Highway 385 was closed. Immediately after the Explorer passed the closed checkpoint, the trooper conducted a traffic stop for the Texas traffic violation of Operate Vehicle with Wrong License Plate, TXTRC:504.944.

The vehicle took longer than normal to slow down and eventually came to a stop. Upon approaching the vehicle, the trooper noticed an individual laying down attempting to conceal himself in the rear cargo area. The trooper requested assistance from Border Patrol agents. The driver was identified as Carlos CASTILLO-Valdez.

All subjects were determined to be Undocumented Non-Citizens. A female passenger gave consent for the trooper to look at her phone, which had the route in google maps from Big Bend National Park to Odessa, Texas. She stated the driver asked her to route them to Odessa.

The trooper began to interview a male passenger, and he had asked the male to identify the driver. The male passenger positively identified CASTILLO-Valdez, and stated he had been communicating with someone with a handheld radio that was found in the vehicle. The male passenger allowed the trooper to look at his phone, too. During the search of the phone, a message was found from a male individual, who the male passenger admitted was the facilitator for smuggling him across the border.

The trooper interviewed CASTILLO-Valdez. After *Miranda* rights advisement and waiver, CASTILLO-Valdez stated they walked across the Rio Grande River, and the vehicle was waiting on the United States side. CASTILLO-Valdez stated he was driving the group to Odessa, Texas. CASTILLO-Valdez admitted he was going to live with his brother in Odessa and his smuggling fees had been waived for driving the group.

  
U.S. Border Patrol Agent



Honorable David B. Fannin U.S.  
Magistrate Judge